

The FCC has altered the rules with its new regulations governing unsolicited fax advertisements. The new rules are damaging to not-for-profit associations. By removing the "established business relationship" qualification from the fax regulations, many associations will be unable to fulfill its obligations to its membership. Members, by their very nature, join an association for information and notices about upcoming publications, educational events and forums. It also seems that it will be difficult to interpret the rules set forth: who will decide what is acceptable under these rules and what is not?

By example, consider one of NACM's department: The Government Receivables Group. This educational unit helps vendors to understand how to do business with the Federal Government properly, so that they are paid on time. The Federal Government should be everyone's best customer. We have help many companies to understand the Wide Area Workflow System and the MOCAS Sytem through conferences and educational events. Should we be unable to alert our members about these conferences, the Government will need to take more of a lead at educating its vendors. The fax broadcasts about the content of these types of seminars would be prohibited under the new regulations. Another example would be Federal Bankruptcy Rules. When the law changes, how will we be able to help the business credit community understand changes in the law?

On behalf of the National Association of Credit Management, we urge the FCC to revist these rules. The Association community has traditionally served a purpose -- and has been relied upon for hundreds of years for information, publications and information.

We respectfully ask for relief and reconsideration of your position.

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